

JP:AEL

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)
and 960)

MWARAMI KIMBENGELE,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

Gregory Stemkowski, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about June 23, 2012, within the Eastern District of New York and elsewhere, defendant MWARAMI KIMBENGELE did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:¹

1. On or about June 23, 2012, MWARAMI KIMBENGELE arrived at John F. Kennedy International Airport ("J.F.K. Airport") in Queens, New York, aboard Turkish Airlines Flight No. 826 from Istanbul, Turkey.

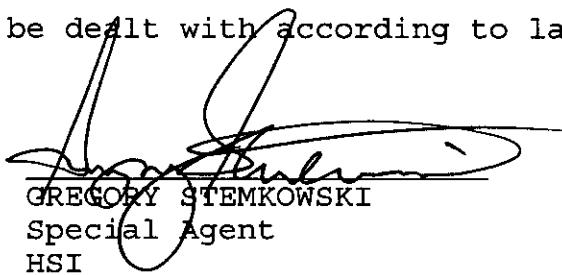
2. Defendant MWARAMI KIMBENGELE was selected for a Customs and Border Protection ("CBP") examination. He presented a Dikaite bag and a Targus bag for inspection. The defendant admitted ownership of the bags and their contents. Upon examination, the CBP officer noticed that the bottom of the Dikaite bag felt unusually thick. A probe of this bag revealed a package concealed within the liner of the bag, which contained a brown, powdery substance that field-tested positive for the presence of heroin.

3. The Targus bag was also examined, and a Toshiba laptop was discovered. Further examination of the laptop revealed a package concealed inside which contained a brown, powdery substance that field-tested positive for the presence of heroin. The defendant was placed under arrest.

^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

4. The total approximate gross weight of the heroin found in defendant MWARAMI KIMBENGELE'S bags is 1,671 grams.

WHEREFORE, your deponent respectfully requests that defendant MWARAMI KIMBENGELE be dealt with according to law.


GREGORY STEMKOWSKI
Special Agent
HSI

Sworn to before me this
25th day of June, 2012

DGE